

**Eddy L'Heureux**

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**Volume: 1  
Pages: 1-11  
Exhibits: 1-2**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

**Case No. 15-CV-00280-PB**

**JONATHAN LEITE,**

**Plaintiff,**

**v.**

**MATTHEW GOULET, et al.,**

**Defendants.**

**DEPOSITION OF EDDY L'HEUREUX**

**August 30, 2017**

**1:50 p.m. to 1:57 p.m.**

**NORTHERN NH CORRECTIONAL FACILITY**

**138 East Milan Road**

**Berlin, New Hampshire**

**Reporter: Celeste A. Quimby, LCR No. 17**

**Jones & Fuller Reporting  
617-451-8900 603-669-7922**

	Page 2	Page 4
1	I N D E X	
2		
3	WITNESS: Eddy L'Heureux	
4		
5	EXAMINATION:	Page
6	By Mr. King	4
7		
8		
9	EXHIBITS FOR IDENTIFICATION:	
10	L'Heureux Description	Page
11	Exhibit 1 Eddy L'Heureux Answers to Interrogatories	4
12	Exhibit 2 8/24/12 Safety and Sanitation Inspection Report	6
13		
14		
15		
16		
17		
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19		
20	(Exhibits scanned/e-mailed to counsel; originals returned to Mr. King.)	
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23		
	Page 3	Page 5
1	A P P E A R A N C E S	
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19	STIPULATIONS	
20	It is agreed that the deposition shall be taken in the first instance in stenotype and when transcribed may be used for all purposes for which depositions are competent under the Federal Rules of Civil Procedure.	
21	Notice, filing, caption, and all other formalities are waived. All objections except as to form are reserved until the time of trial.	
22	It is further agreed that if the deposition is not signed within thirty (30) days after submission to counsel, the signature of the deponent is waived.	
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Page 6	Page 8
<p>1 A. I would just go over and look at them 2 physically and see if they're breathing. If 3 they're breathing and they don't look like they 4 have any marks, they're usually all right. 5 They're usually sleeping.</p> <p>6 Q. Okay. But if you look into a cell during 7 the daytime and you see someone not upright, lying 8 down in a bed, you check on them?</p> <p>9 A. I always check on them, see if they're 10 all right. Yes, I'll look in.</p> <p>11 Q. All right. Okay. You worked first shift 12 on August 24th, 2012, right?</p> <p>13 A. As per recollection, yes, as per what 14 I've read on our shift log.</p> <p>15 Q. Yeah. First shift runs from what time to 16 with a time?</p> <p>17 A. 0700 to 1500, sir.</p> <p>18 (L'Heureux Exhibit 2 marked 19 for identification.)</p> <p>20 Q. What we've marked as Exhibit 2 in your 21 deposition is a rounds log --</p> <p>22 A. Um-hum.</p> <p>23 Q. -- for August 24th, 2012?</p>	<p>1 A. That would be correct, because she was 2 working with me.</p> <p>3 Q. Yeah.</p> <p>4 MR. KING: Thank you, sir. I don't have 5 anything further.</p> <p>6 MR. FREDERICKS: All set.</p> <p>7 (Deposition concluded at 1:57 p.m.)</p>
Page 7	Page 9
<p>1 A. Correct.</p> <p>2 Q. Okay. Does this document reflect that 3 you did a round on F block at -- or you did rounds 4 at 2:15 p.m. for the last time on August 24th, 5 2012?</p> <p>6 A. As it's written here, sir, that's what it 7 would be reflecting. And it wouldn't have been 8 just F block. It would have been Echo, Fox, Golf 9 and Hotel. We have to do rounds on all four. So 10 the round may have been started a little sooner.</p> <p>11 Q. Yeah.</p> <p>12 A. And it would have been recorded when we 13 came out.</p> <p>14 Q. I see. And that was your last round of 15 the day, right?</p> <p>16 A. That was our last round of the day. I 17 wasn't working alone. I mean we need to be two 18 officers minimum.</p> <p>19 Q. Understood. And you were working with 20 Officer Snyder; is that right?</p> <p>21 A. Correct.</p> <p>22 Q. And so the round that ended at 2:15 p.m. 23 was also her last round of the day; is that right?</p>	<p>1 CERTIFICATE OF WITNESS</p> <p>2</p> <p>3 I, Eddy L'Heureux, have read the foregoing 4 transcript of deposition taken on Wednesday, 5 August 30, 2017, at the Northern NH Correctional 6 Facility, Berlin, New Hampshire, and do hereby 7 swear/affirm it is an accurate and complete record 8 of my testimony given under oath in the matter of 9 Leite v. Goulet, et al., including any and all 10 corrections that may appear on those pages denoted 11 as "Corrections."</p> <p>12</p> <p>13</p> <p>14 _____ 15 Eddy L'Heureux 16 STATE OF _____ 17 COUNTY OF _____</p> <p>18 Subscribed and sworn to before me this _____ day 19 of _____, 2017.</p> <p>20</p> <p>21</p> <p>22 Notary Public _____ J.P. _____ 23 My Commission Expires: _____</p>

Page 10

1       CORRECTION AND SIGNATURE PAGE  
2       DEPOSITION: Eddy L'Heureux  
3       DATE OF DEPOSITION: August 30, 2017  
4       PAGE LINE     NOW READS     SHOULD READ

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20      Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2017.

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23      Eddy L'Heureux

Page 11

1                   C E R T I F I C A T E  
2      I, Celeste A. Quimby, a Licensed Court  
3      Reporter of the State of New Hampshire, do hereby  
4      certify that the foregoing is a true and accurate  
5      transcript of my stenographic notes of the  
6      deposition of Eddy L'Heureux, who was first duly  
7      sworn, taken at the place and on the date  
8      hereinbefore set forth.

9      I further certify that I am neither attorney  
10     nor counsel for, nor related to or employed by any  
11     of the parties to the action in which this  
12     deposition was taken, and further that I am not a  
13     relative or employee of any attorney or counsel  
14     employed in this case, nor am I financially  
15     interested in this action.

16      THE FOREGOING CERTIFICATION OF THIS TRANSCRIPT  
17     DOES NOT APPLY TO ANY REPRODUCTION OF THE SAME BY  
18     ANY MEANS UNLESS UNDER THE DIRECT CONTROL AND/OR  
19     DIRECTION OF THE CERTIFYING REPORTER.

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23      CELESTE A. QUIMBY, LCR No. 17